

**UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF MINNESOTA**

In re Baycol Products Litigation

UNITED STATES OF AMERICA, *ex rel.*  
LAURIE SIMPSON,

Plaintiff,

v.

BAYER HEALTHCARE  
PHARMACEUTICALS, INC.;  
BAYER CORP; and  
BAYER A.G.,

Defendants.

MDL No. 1431  
Civil No. 08-5758-MJD-ECW

Motion Date: To Be Determined

Oral Argument Requested

**G.C. ROBINSON LAW, PLLC's  
LOCAL RULE 7.1(a) MEET AND CONFER STATEMENT**

The undersigned counsel, who previously served as counsel for Relator from 2012 to 2015, has previously undertaken to resolve the claim of G.C. Robinson Law, PLLC (“Robinson Law”), as assigner of Relator Laurie Simpson, against Defendants for statutory attorneys’ fees under 31 U.S.C. § 3730(d)(2). These efforts were made through regular communications with Relator’s present counsel, David Bocian of Kessler Topaz Meltzer Check LLP including, without limitation, providing Mr. Bocian with a true and correct copy of Robinson Law’s billing statement and a supporting declaration on November 6, 2021. I understand the information provided was used by Mr. Bocian during his unsuccessful efforts to mediate and/or negotiate all statutory attorneys’ fees claims against defendants. Robinson Law joins in the Local Rule 7.1(a) statement of Kessler Topaz to the extent it applies to Robinson Law’s claim.

Dated: January 6, 2023

/s/ Gerald C. Robinson  
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